

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Exhibitgroup Giltspur - Chicago  
Attn: Robert Scupin  
200 North Gary Avenue  
Roselle, Illinois 60172

Application No.: 00040098

I.D. No.: 043482AAS

Applicant's Designation:

Date Received: April 3, 2000

Subject: Coating Operation

Date Issued: July 24, 2002

Expiration Date: July 24, 2007

Location: 200 North Gary Avenue, Roselle

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of six spray booths controlled by six filters and clean-up operations pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 25 tons/year for volatile organic mater (VOM)). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. This permit is issued for the miscellaneous metal parts and products coating operation based on its not being required to meet the requirements of 35 Ill. Adm. Code 218.204(j)(4)(A) by qualifying for the exemption in 218.208(a). To qualify for this exemption, emissions of VOM from all miscellaneous metal parts and products coating lines must not exceed 15 lbs/day before the application of capture systems and control devices.
- b. This permit is issued based on the coating operations described in the application being exempted from the requirements of 35 Ill. Adm. Code 218.204 (1) for wood furniture coating, pursuant to 35 Ill. Adm. Code 218.208 (b)(2). Total emissions of volatile organic material (VOM) from the coating operation is limited to less than 25 tons per year in a federally enforceable permit.

3. Emissions of VOM and operation of the six spray paint booths shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
Coatings	1.2	12.0	1.2	12.0
Thinners	1.1	11.0	1.1	11.0
Clean Up Solvents	0.1	1.0	0.1	<u>1.0</u>
		Totals:	2.4	24.0

These limits define the potential emissions of VOM and are based on maximum solvent usages, maximum VOM content, and limits as requested by the company. VOM usage and emissions shall be calculated based on Condition 7(c). Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

4. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.
5. In the event that the operation of this emission unit results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
6. The Permittee shall comply with the following reporting requirements, pursuant to 35 Ill. Adm. Code 218.211(b).
  - a. A certification to the Illinois EPA that the miscellaneous metal parts and products coating line or group of coating lines is exempt under the provisions of Section 218.208(a). Such certification shall include:
    - i. A declaration to the Illinois EPA that the miscellaneous metal parts and products coating line or group of coating lines is exempt from the limitations of Section 218.204 because of the provisions of 218.208(a).
    - ii. Calculations which demonstrate that the combined VOM emissions from the miscellaneous metal parts and products coating line or group of coating lines never exceed 15 lbs/day before the application of capture systems and control devices. The following equation shall be used to calculate total VOM emissions:

$$Te = \prod_{j=1}^m \prod_{i=1}^n (AiBi)_j$$

Where:

Te = Total VOM emissions from the miscellaneous metal parts and products coating lines each day before the application of capture systems and control devices in units of lbs/day;

m = Number of coating lines at the source that otherwise would be subject to the same subsection of Section 218.104 of this Part;

j = Subscript denoting an individual coating line;

n = Number of different coatings applied each day on each miscellaneous metal parts and products coating line;

i = Subscript denoting an individual miscellaneous metal parts and products coating line;

Ai = Weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each miscellaneous metal parts and products coating line in units of lbs VOM/gal; and

Bi = Volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each miscellaneous metal parts and products coating line in units of gal/day.

- b. The Permittee shall notify the Illinois EPA of any record showing that total VOM emissions from the miscellaneous metal parts and products coating line or group of coating lines exceed 15 lbs in any day before the application of capture systems and control devices by sending a copy of such record to the Illinois EPA within 30 days after the exceedance occurs.
7. The Permittee shall maintain records of the following items:
    - a. Amount of each coating, thinners, and clean up solvents used on all the coating lines (gal or tons/mo and gal or tons/yr);
    - b. VOM content of each coating, thinners, and clean up solvents used on all the coating lines (lb VOM/gal or wt.%);
    - c. Calculations of VOM usage and emissions. The following equations shall be used to calculate VOM emissions:

$$Te = \sum_{i=1}^n AiBi$$

Where:

Te = VOM usage in units of lb/mo

N = Number of different coating, thinner, clean up solvent, and any other VOM containing material used each month

i = Subscript denoting an individual coating, thinner, clean up solvent, and any other VOM containing material

Ai = Weight of VOM per volume of each coating, thinner, clean up solvent, and any other VOM containing material used each month in units of lbs VOM/gal

Bi = Amount of each coating, thinner, clean up solvent, and any other VOM containing material used each month in units of gal/mo

- d. Daily records of the identification and amount of each coating as applied on the miscellaneous metal parts and products coating line (gal or lb/day).
  - e. Daily records of the VOM content of each coating as applied on the miscellaneous metal parts and products coating line (lbs VOM/gal or wt. %).
  - f. Daily emissions of VOM (lb/day) from the miscellaneous metal parts and products coating line.
  - g. Detailed calculations of plantwide VOM emissions (ton/mo and ton/yr).
- 8a. The Permittee shall obtain appropriate permits from the Agency in advance of any change in operation which would result in VOM emissions that are in excess of 25 tons per year.
  - b. The Permittee shall be required to comply with the requirements of 35 Ill. Adm. Code 218.204 (1) for wood furniture coating if VOM emissions for the plant exceed 25 tons per year.
9. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours

so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.

10. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
11. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

12. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year: solvent usages, solvent VOM content, and detailed calculations of VOM emissions from the prior calendar year. If there has been no exceedance of a requirement of this permit during the prior calendar year, the annual emission report shall contain a statement to that effect.

If you have any questions on this, please call Tara T. Nguyen-Ede at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1  
Illinois EPA, Compliance Section  
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating facility operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled and control measures are more effective than required in this permit.

1. Emissions of VOM and operation of the six spray paint booths shall not exceed the following limits:

<u>Material</u>	<u>VOM Usage</u>		<u>VOM Emissions</u>	
	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>	<u>(Ton/Mo)</u>	<u>(Ton/Yr)</u>
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		Totals:	2.3	<u>23.0</u>

These limits define the potential emissions of VOM and are based on maximum solvent usages, maximum VOM content, and limits as requested by the company. VOM usage and emissions shall be calculated based on Condition 7(c). Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months.

2. The emissions of Hazardous Air Pollutants (HAP) as listed in Section 112(b) of the Clean Air Act shall be less than 10 tons/year of any single HAP and 25 tons/year of any combination of such HAPs. As a result of this condition, this permit is issued based on the emissions of all HAPs from this source not triggering the requirements to obtain a Clean Air Act Permit Program Permit (CAAPP), and Section 112(G) of the Clean Air Act.

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